

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

I. Purpose

This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.

II. Directions

1. *Please complete a separate form for each issue.*
2. *Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.*
3. *Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.*
4. *Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.*

III. Submitting Carrier(s) General Information

Submitted by: (Name of Carrier(s) AT&T

Contact [Name of Carrier Representative(s)]

Telephone Number: (NPA)-NXX-XXXX

e-mail:

David J. Chorzempa

(312) 230-3503

dchorzempa@att.com

Subject Matter Expert (SME): (name)

Telephone Number: (NPA)-NXX-XXXX

e-mail:

Shannie Tavares

510-276-8436

smtavares@att.com

Authorized Representative: (Name of person empower to make decisions and enter into agreements on behalf of the submitting carrier(s))

Telephone Number: (NPA)-NXX-XXXX

e-mail:

Depending on the issue, same as representatives noted above, with counsel from client groups.

IV. Issue Identification

Name: *(short identifier)* Global Issue AT&T Issue No. 1

Brief Description:

SBC continues to generate inaccurate wholesale bills. SBC continues to mis-bill CLECs and otherwise bill CLECs for lines they do not have.

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered?
2. How many occurrences and approximately over how long a period of time?
3. Is it a recurring problem?
4. Your belief as to the cause of the problem.
5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low?
7. Any other pertinent information?

AT&T refers to the other issues it has identified, all of which support this global issue.

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how?
2. Was this issue escalated for dispute resolution? If so, when and in what forum?
3. Last known position of the opposing carrier.
4. Were any bill adjustments made to resolve this issue?
5. Were any policies or procedures changed to address this issue? If so, what changes were made?

AT&T refers to the other issues it has identified, all of which support this global issue.

VII. Relief Sought

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

AT&T refers to the other issues it has identified, all of which support this issue.

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.

SBC does not believe that its industry standard billing systems are systemically

rendering inaccurate bills to CLECs. SBC Wisconsin passed all of the applicable billing testing points as determined by Bearing Point. Similarly, the PSCW has already found that there is no evidence of systemic problems in SBC Wisconsin's billing systems. AT&T's lack of specificity makes any further in-depth response impossible.

2. Does this issue involve an interpretation and/or application of law, contract or tariff? *See above. If so, please explain.*
3. What performance measures can be implemented to monitor the desired system operation? *See above.*
4. Any other pertinent information?

SBC is committed to responding to any CLEC-raised billing issues on a business-to-business basis. SBC offers CLECs a Lines in Service report that allows CLECs to perform periodic audits and thereby identify the occasional error, among the hundreds of thousands of orders issued on behalf of the CLECs, keeping those errors to a minimum. In fact, in a recent review of one such report, AT&T filed public comments claiming that 1900 lines contained errors. Upon review, SBC confirmed that approximately three-fourths of these lines were actually AT&T record keeping errors. Had AT&T worked with SBC on a business-to-business basis, it would not have been necessary to concern any Commission with this trivial number of inaccuracies.

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *See above.*
2. Were any bill adjustments made to resolve this issue? *N/A*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *N/A*
4. Identify any other carrier(s) known to have experienced similar problems. *N/A*
5. Did you identify any other problems arising from or related to this issue? *N/A*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *N/A*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *N/A*

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

Contact: *Jim Jermain*

Telephone Number: *(608) 252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Fred Christensen*

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Authorized Representative: *Carla Rowland*
Telephone Number: (214) 464-7511
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X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

Investigation into the Wholesale Billing Practices of
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SVS Comments

I. Purpose

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II. Directions

1. Please complete a separate form for each issue.
2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.
3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.
4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.

III. Submitting Carrier(s) General Information

Submitted by: (Name of Carrier(s)) AT&T

Contact [Name of Carrier Representative(s)]

Telephone Number: (NPA)-NXX-XXXX

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smtavares@att.com

Authorized Representative: (Name of person empower to make decisions and enter into agreements on behalf of the submitting carrier(s))

Telephone Number: (NPA)-NXX-XXXX

e-mail:

Depending on the issue, see above, with consultation of clients.

IV. Issue Identification

Name: (*short identifier*) Notice and Verification of Billing Adjustments (ATT Issue 2)
 Brief Description:

SBC fails to provide sufficient notice of significant billing adjustments. SBC provides these adjustments (credits or debits) absent any explanation or advanced notice. A recent example of this problem occurred just this summer when SBC conducted a review of bills to ensure consistency with state-approved rates. That review uncovered other problems, including inaccurate rate zones. AT&T received a \$600,000 debit without sufficient explanation or notice. SBC also does not provide CLECs the methodology by which SBC determined the credit or debit. AT&T has also recently received credits in June for over \$520,000 (concerning misbilling of operator assisted and directory assistance calls), but the reason for the credit was not clearly identified on the bill.

AT&T recommends the following:

- The process should require SBC to notify CLECs via Accessible Letter with simultaneous communication by Account Managers of the specific impact to each individual CLEC. This notification should occur well before any adjustments are applied to wholesale bills.
- SBC must attempt to reach agreement, and resolve any disagreements, re: the applicable contractual limitations on backbilling of both debits and credits, again before any adjustments are applied to wholesale bills
- SBC must provide sufficient back-up details to support the adjustment (for example, for the rate zone reclassification, that would include number of lines impacted, rate centers involved, etc.) before any adjustments are applied to wholesale bills.
- SBC must allow a reasonable interval for the CLEC to review the back-up detail and validate the adjustment before any adjustments are applied to wholesale bills.

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered?
2. How many occurrences and approximately over how long a period of time?
3. Is it a recurring problem?
4. Your belief as to the cause of the problem.
5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low?
7. Any other pertinent information?

This issue has existed for as long as SBC has provided bills, but has more recently surfaced as a result of the major reconciliation and audits SBC has conducted on billing in the former Ameritech region. It is a recurring problem. As to the cause, AT&T refers to the recommendations noted above. This is a high priority item.

VI. Prior Attempts to Resolve the Issue (*Please do not re-argue your case here or submit supporting documents.*)

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how?
2. Was this issue escalated for dispute resolution? If so, when and in what forum?
3. Last known position of the opposing carrier.
4. Were any bill adjustments made to resolve this issue?
5. Were any policies or procedures changed to address this issue? If so, what changes were made?

To be provided.

VII. Relief Sought

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

See recommendations above.

VIII. Opposing Carrier's Response (to be completed after July 30, 2003, prehearing)

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.

As a result of a CLEC dispute filed in Michigan and Ohio, SBC Midwest completed an investigation to verify whether it is billing the proper UNE loop rate zone for each wire center in five Midwest states, including Wisconsin. The identification of the appropriate UNE loop rate zone is complicated by the fact that the state tariff lists rate zones by exchange (i.e. center city or town), not by CLLI code. Thus, the exchange must be translated to a CLLI code. Further, some CLLIs serve multiple exchange center cities (or towns) that may have different rate zones. Based upon this investigation, SBC Midwest identified eight (8) single-rate wire centers in Wisconsin in which SBC Midwest had previously billed an incorrect loop rate for loops served in those wire centers (there are 105 wire centers in Wisconsin). All unbundled loop types in these aforementioned wire centers were affected, including stand-alone loops, UNE-P loops, and the high frequency portion of the loop (HFPL). SBC Midwest issued Accessible Letter CLECAM-196 on June 6, 2003, to provide CLECs notice of this issue.

With respect to the eight wire centers with erroneous coding at the wire center level, SBC Midwest updated all unbundled loop rates to apply the correct loop rate zone in support of ongoing order activity. As a consequence of discovering these rate-zone issues, SBC Midwest has now issued appropriate credit and debit adjustments for prior billing on the embedded base of affected loops.

With respect to the DA issue, SBC Midwest discovered during 2002 that, due to system coding errors, some local DA calls had been erroneously billed to WI UNE-P CLECs at National DA retail rates – as opposed to local DA wholesale

rates. As of May 9, 2002, SBC Midwest corrected the incorrect billing logic. SBC Midwest also identified in 2002 that UNE-P CLECs were being billed the state specific retail rate per local DA call completion - as opposed to the wholesale rate. The correction for this issue involved a complete re-write of the billing logic for DA call completion, which was initiated during 2002 and implemented on April 10, 2003.

With respect to the OA issue, SBC Midwest also discovered in 2002 that RBS was billing UNE-P CLECs at the retail rate - as opposed to once at the applicable wholesale rate and also double billed some OA call types. SBC Midwest implemented an interim solution to correct the problem in October 2002 and a permanent solution was implemented in April 2003.

2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.

This was not an interpretation or application of law issue.

3. What performance measures can be implemented to monitor the desired system operation?

No additional Performance Measurements are necessary.

4. Any other pertinent information? *No.*

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.

On August 18, 2003 AT&T notified SBC that it was officially disputing the calculations of the Loop Zone issue and SBC's right to backbill for these undercharges.

2. Were any bill adjustments made to resolve this issue?

Specific to Wisconsin, AT&T and Teleport Communications Group (TCG) received the following adjustments:

Zone Issue

\$4,537.78 (backbilled to AT&T/TCG)

OA/DA

\$0.00 for AT&T

\$41.12 (net credit to TCG on a credit of \$105.70 and a debit of \$64.58)

3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).

SBC Midwest issued an Accessible Letter CLECAM-196 on June 6, 2003, to provide CLECs notice of this issue. In addition, Account Management contacted AT&T on July 17th to provide additional information on the credit/debit amounts and the BAN or RBS bill information that the credits/debits would appear.

4. Identify any other carrier(s) known to have experienced similar problems.

Zone Issue (Total WI ACNAs impacted = 9)

AAV

UXW

WUA

MSN
SGZ
TPM
OCB
LOA
TVN

Operator Services Issue (Total WI ACNAs impacted = 24)

AVO BUL ELZ FLS
GCG ICY IOR KCO
LGA LUL MAX MWU
NDT NWF OCB SGZ
SIU TGN TPM TVN
UXW VRT VUL WUA

5. Did you identify any other problems arising from or related to this issue?
No.
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
No steps taken.
See Attached Accessible Letter



CLECAM03-196.doc
(83 KB)

7. Were any policies or procedures changed to address this issue? If so, what changes were made?
See #1 Above

Submitted by: *SBC*

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X. Further Investigative Activities (*for staff use only*)

XI. Final Disposition <i>(for staff use only)</i>

MN182762_1

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Shannie Tavares

510-276-8436

smtavares@att.com

Authorized Representative: (Name of person empower to make decisions and enter into agreements on behalf of the submitting carrier(s))

Telephone Number: (NPA)-NXX-XXXX

e-mail:

Depending on the issue, same as representatives noted above, with counsel from client groups.

IV. Issue Identification

Name: (*short identifier*) Billing Dispute Resolution (AT&T Issue 3)

Brief Description :

The processes described in AT&T's ICAs are clear and sufficient, and do not require AT&T to fill out burdensome forms, or to interface with the LSC rather than the Account Team, in order to raise, document and attempt to resolve billing disputes. SBC did not attempt to modify that process in negotiation of the renewal ICAs.

- SBC has complained that AT&T is not following its standard process, which requires CLECs to fill out a Dispute Resolution form for each disputed TN, with no benefit of discussion to clarify issues before the dispute is initiated. It's our understanding that responses are returned at the TN level (e.g. if we raise a generic dispute affecting thousands of lines, we would receive thousands of responses back for the same issue).
- AT&T's current process is to discuss issues on a bi-weekly call with the Account Team and billing SMEs, to set up supplemental calls to discuss specific issues, and to document issues on an Issue Log and supplemental email message and correspondence.
- SBC has recently suggested that AT&T has to sign a Non Disclosure Agreement in order to enter into settlement discussions on disputed billing, which is a change to our established practices. Again, confidentiality provisions of the ICAs are sufficient and separate NDAs are not necessary.

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered?
2. How many occurrences and approximately over how long a period of time?
3. Is it a recurring problem?
4. Your belief as to the cause of the problem.
5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low?
7. Any other pertinent information?

This is a recurring problem, as it relates to the manner in which AT&T is to raise billing disputes. AT&T does believe this issue is generic because it relates to SBC's onerous processes for raising billing disputes. However, AT&T also believes that these processes are inconsistent with its interconnection agreement. AT&T gives this issue high priority.

VI. Prior Attempts to Resolve the Issue (*Please do not re-argue your case here or submit supporting documents.*)

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how?
2. Was this issue escalated for dispute resolution? If so, when and in what forum?
3. Last known position of the opposing carrier.
4. Were any bill adjustments made to resolve this issue?
5. Were any policies or procedures changed to address this issue? If so, what changes were made?

To be provided.

VII. Relief Sought

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

See recommendations on AT&T's process described above. SBC should eliminate its onerous dispute resolution requirements.

VIII. Opposing Carrier's Response (to be completed after July 30, 2003, prehearing)

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
SBC does not believe that its billing dispute resolution process is onerous. SBC believes that the nature of the process requires all parties to be as detailed and accurate as possible.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
To a certain extent, yes. The parties' agreement at section 28.2.1.1.1 requires a disputing party to supply "...the specific details and reasons for disputing each item including, without limitation, and as applicable, the date of the bill in question, CBA/BAN number of the bill, the telephone number, customer code, circuit I.D. number or trunk number and the USOC information questioned." In effect, AT&T is requesting the commission to relieve it of its contractual obligation. That is not the purpose of this docket.
3. What performance measures can be implemented to monitor the desired system operation?
During the next six-month review SBC is proposing the following PMs in order to measure its performance in regard to the billing dispute and resolution process.

PM CLEC BLG-2 - Measures the percent of time that SBC Midwest acknowledges CLEC billing claims/disputes within 5 business days of receipt by SBC Midwest.

PM CLEC BLG-3 - Measures the percent of time that SBC Midwest sends claims resolution notifications to the CLEC within 30 business days of receipt by SBC Midwest.
4. Any other pertinent information?

AT&T claims that the SBC LSC's billing dispute resolution process is onerous and that AT&T is not required to use the process based on its Interconnection Agreement (ICA) with SBC. As shown, AT&T's position is incorrect from a legal standpoint. In refusing to use the LSC's billing dispute process, AT&T is only doing a disservice to itself and its customers. By insisting that the SBC Account Team be involved in the billing dispute process, AT&T is prolonging the timely resolution of billing disputes and needlessly involving valuable resources belonging to both AT&T and SBC.

AT&T's salient complaint seems to be that the forms used in the dispute resolution process are too detailed and that the response that SBC would provide AT&T would be onerous. "If we (AT&T) raise a generic dispute affecting thousands of lines, we would receive thousands of responses back for the same issue" (AT&T – 3). This allegation is incorrect. Under the scenario AT&T describes, AT&T would receive a single resolution response. However, that response would have the detailed information for each line impacted. That is, AT&T would receive a single resolution response that would include an attached spreadsheet with the line-by-line details of the accounts impacted. That is exactly what the parties' agreement provides.

Common sense would tell one that AT&T would want to have a substantial level of detail in order to provide its own end users with any appropriate credits that may be due the end user as a result of the dispute resolution. That is, if AT&T were planning on passing any credits back to the consumer it would have to know which end users were impacted in order to do so. By using the SBC LSC dispute resolution process, AT&T could extract enough information from the resolution response spreadsheet for it to make any end user credits as quickly and easily as possible.

As noted on the CLEC Online web site at <https://clec.sbc.com/clec/>, billing claims should be submitted using the standard Excel spreadsheet format. The information included must be sufficient to enable SBC to successfully investigate and process all billing disputes and claims for adjustments.

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *See above.*
2. Were any bill adjustments made to resolve this issue? *See above.*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *See above.*
4. Identify any other carrier(s) known to have experienced similar problems. *See above.*
5. Did you identify any other problems arising from or related to this issue? *N/A.*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *See above.*

7. Were any policies or procedures changed to address this issue? If so, what changes were made?

This issue, to the extent it goes beyond the plain views of AT&T's interconnection agreement, is an issue that impacts virtually every CLEC conducting business with SBC. Accordingly, this issue is best addressed in an industry-wide forum.

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XI. Final Disposition (for staff use only)

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Telephone Number: (NPA)-NXX-XXXX

e-mail:

Depending on the issue, same as representatives noted above, with counsel from client groups.

IV. Issue Identification

Name: (*short identifier*) CABS Reconciliation

Brief Description (AT&T Issue 4):

SBC's reconciliation after its CABS conversion is fraught with errors and based on a flawed methodology. SBC has not correctly calculated the debits and credits associated with its incorrect wholesale bills, is still disclosing information about the reconciliation on a piecemeal basis, and has not attempted to address any of the criticisms that CLECs have raised regarding the reconciliation.

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered?
2. How many occurrences and approximately over how long a period of time?
3. Is it a recurring problem?
4. Your belief as to the cause of the problem.
5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low?
7. Any other pertinent information?

SBC's so-called data bash reconciliation took place in January 2003. This reconciliation was intended upon synchronizing SBC's new CABS billing system and its provisioning databases (to ensure that all provisioned UNE-P orders were included in CABS). SBC had converted UNE-P billing to CABS in late 2001. This reconciliation uncovered massive problems with SBC's region-wide wholesale billing, with thousands of UNE-P orders being held and UNE-P orders not posting to SBC's billing system. This reconciliation proved that CLECs had not received timely, accurate, and auditable bills since the conversion of CABS in late 2001. The root cause of the problems is still unknown. In addition, SBC's methodology for calculating debits and credits is flawed, as is SBC's refusal to take corrective actions, such as providing more information as to the percentage of time that it used default dates in lieu of actual connect and disconnect dates, or confirming that it will revise debit or credit calculations. SBC has also improperly limited credits based upon contractual timeframes because there is no provision in the interconnection agreement that would operate to limit the duration of credits. AT&T designates this issue as high priority.

AT&T refers to its 271 comments filed in the Wisconsin 271 proceeding, as well as its declarations and comments filed in the FCC Michigan 271 proceedings. These documents provide the detail requested. AT&T has circulated a copy of those documents along with this form.

VI. Prior Attempts to Resolve the Issue (*Please do not re-argue your case here or submit supporting documents.*)

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how?
2. Was this issue escalated for dispute resolution? If so, when and in what forum?
3. Last known position of the opposing carrier.
4. Were any bill adjustments made to resolve this issue?
5. Were any policies or procedures changed to address this issue? If so, what changes were made?

This issue has been raised with SBC in correspondence and in FCC 271 pleadings since the beginning of 2003. This issue has not been taken to formal dispute resolution as yet, although it is being raised in the context of the pending SBC 271 applications with the FCC. SBC refuses to take corrective action or to modify its positions.

AT&T further refers to its 271 comments filed in the Wisconsin 271 proceeding, as well as its declarations and comments filed in the FCC Michigan 271 proceedings. AT&T has provided some of those documents along with this form.

VII. Relief Sought

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

AT&T wishes to ensure that the reconciliation is accurate and that any problems uncovered in it, in regard to both systems and process, are fixed.

AT&T further refers to its 271 comments filed in the Wisconsin 271 proceeding, as well as its declarations and comments filed in the FCC Michigan 271 proceedings. AT&T has provided some of those documents with this form.

VIII. Opposing Carrier's Response (to be completed after July 30, 2003, prehearing)

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
The cause of this issue, which was thoroughly discussed in various ex-parte and other filings, in addition to direct meetings with AT&T, was based on some problems that resulted from the initial conversion effort in 2001. SBC has thoroughly discussed the resolution to the issue, including system improvements and the reconciliation itself. Again, these topics have been thoroughly discussed over the past five months.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
This issue involves contract interpretations with respect to SBC's application of time credits resulting from the ACIS/CABS reconciliation that would apply to AT&T. SBC has applied credits consistent with AT&T's interconnection agreements. In addition, SBC's process to apply credits and debits was completely validated by E&Y. To the extent that AT&T has concerns with the way in which SBC applied credits for specific circuits, those issues should be

addressed on a business-to-business basis.

3. What performance measures can be implemented to monitor the desired system operation?

SBC has offered to implement a new Billing performance measurement to measure the synchronicity between the ACIS database, which reflects the UNE-P services provisioned, and the CABS database, which reflects what is being billed to the CLECs. Any out-of-sync conditions between the two databases would be identified by this measurement.

4. Any other pertinent information?

SBC has been and is ready to investigate any claims with specific circuit information, in addition to further discussing the contractual issues they raise. Moreover, SBC has engaged E&Y to thoroughly validate the effectiveness of the reconciliation to synchronize both the ACIS and CABS databases, the resulting credits and debits from the reconciliation process, and a more current analysis of the synchronicity of the two databases after several months have passed and over 1.7 million UNE-P service orders have processed.) The results from the E&Y audit of the mechanical reconciliation process were outstanding. AT&T has provided a list of 1,941 circuits that it wanted SBC to investigate, however, despite the fact that most of those alleged SBC "errors" were determined to be within AT&T's own systems, this analysis of AT&T's Lines-in-Service report has no direct relationship to the reconciliation process conducted in January 2003.

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.

AT&T continues to indicate that the methods for calculating the credits and debits were flawed, and SBC refuses to take corrective action. AT&T seems fixated on finding the percentage of time that SBC used default dates in the reconciliation process, which will not assist in resolving any of AT&T's perceived problems with the reconciliation. Since the application of the default dates in circumstances where SBC was unable to mechanically determine actual connect or disconnect dates would only result in over-credits or under-billing, AT&T needs to simply provide a list of circuits for which they believe that they were either over-billed or under-credited. Until SBC has such a list of legitimate billing claims, it is unable to investigate AT&T's general allegations. AT&T has provided a list of circuits that it believes SBC is billing erroneously; however, the preponderance of those circuits have been found to be problems with AT&T's own systems, and raise no issues related to claims of credits and debits from the reconciliation.

2. Were any bill adjustments made to resolve this issue?

No. No specific billing claims have been filed, nor has any formal billing dispute been filed regarding the reconciliation (see AT&T's response above).

3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). N/A

4. Identify any other carrier(s) known to have experienced similar problems.

MCI has generally alleged that credits and debits related to the reconciliation were not calculated correctly, but it has not provided any specific examples. MCI

has provided examples of circumstances where it believes that SBC is billing incorrectly; however, similar to the AT&T situation, SBC is finding that most of these issues are related to MCI record-keeping problems. SBC's investigation of these 5,600 MCI UNE-P circuits is continuing, and results should be disclosed within the next week. Again, this Lines-in-Service analysis is unrelated to the execution of the January 2003 UNE-P reconciliation processes.

5. Did you identify any other problems arising from or related to this issue?
As previously mentioned, SBC directed E&Y to thoroughly audit the reconciliation process, and the results of the audit have been publicly disclosed. As a result of certain contract interpretation issues, it was necessary during the audit to adjust, in some circumstances, credit and debit effective dates. The mechanical reconciliation missed a small percentage of circuits, which were identified and corrected within weeks following the reconciliation, which correction was also fully tested by E&Y.
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
See E&Y report. SBC directed E&Y to thoroughly audit the reconciliation process.
7. Were any policies or procedures changed to address this issue? If so, what changes were made?
Since the reconciliation was a one-time event, no new policies or procedures are required.

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

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X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

Depending on the issue, same as representatives noted above, with counsel from client groups.

IV. Issue Identification

Name: *(short identifier)* PM 17 Restatement

Brief Description (AT&T Issue 5):

SBC inappropriately refuses to restate PM 17 (the billing completeness timeliness measure) to reflect the late postings to CABS of orders affected by the CABS reconciliation.

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered?
2. How many occurrences and approximately over how long a period of time?
3. Is it a recurring problem?
4. Your belief as to the cause of the problem.
5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low?
7. Any other pertinent information?

AT&T refers to its 271 comments and declarations filed in the FCC Michigan 271 proceedings. AT&T will provide copies of these documents if requested.

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how?
2. Was this issue escalated for dispute resolution? If so, when and in what forum?
3. Last known position of the opposing carrier.
4. Were any bill adjustments made to resolve this issue?
5. Were any policies or procedures changed to address this issue? If so, what changes were made?

AT&T refers to its 271 comments and declarations filed in the FCC Michigan 271 proceedings. AT&T will provide copies of these documents if requested.

VII. Relief Sought

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

Restatement of PM 17.

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.

AT&T has made this same claim in the FCC proceedings in each SBC Midwest state and in business-to-business discussions. SBC discusses AT&T's issue in the James D. Ehr Wisconsin Affidavit at ¶¶197-199 ("Affidavit of James D. Ehr Regarding Wisconsin Performance Measurements, FCC WC Docket No. 03-167) and provides a direct response to the question in the letter from Thomas Harvey to Sarah DeYoung, which AT&T has attached to its FCC filings. To quote from page two of that letter, "As you know, PM17 captures service orders posted to CABS. Cancelled service orders do not post to CABS and therefore are not included in PM17 results. As such, PM17 results cannot be "restated" as AT&T requests."

In sum, as PM17 requires a service order to post to the billing system in order to be measured, and the cancelled orders did not post to the CABS billing system; i.e., they cannot be measured. No restatement is necessary.

2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *No.*
3. What performance measures can be implemented to monitor the desired system operation? *N/A*
4. Any other pertinent information? *No.*

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.
AT&T continues to request restatement of PM17 results.
2. Were any bill adjustments made to resolve this issue? *N/A*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *N/A*
4. Identify any other carrier(s) known to have experienced similar problems. *N/A*
5. Did you identify any other problems arising from or related to this issue? *N/A*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *N/A*
7. Were any policies or procedures changed to address this issue? If so, what changes were made?
No.

IX. Opposing Carrier's General Information (to be completed after July 30, 2003, prehearing)

Submitted by: *SBC*

Contact: *Jim Jermain*

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X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

I. Purpose

This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.

II. Directions

1. Please complete a separate form for each issue.
2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.
3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.
4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.

III. Submitting Carrier(s) General Information

Submitted by: (Name of Carrier(s) AT&T

Contact [Name of Carrier Representative(s)]

Telephone Number: (NPA)-NXX-XXXX

e-mail:

David J. Chorzempa

(312) 230-3503

dchorzempa@att.com

Subject Matter Expert (SME): (name)

Telephone Number: (NPA)-NXX-XXXX

e-mail:

Shannie Tavares

510-276-8436

smtavares@att.com

Authorized Representative: (Name of person empower to make decisions and enter into agreements on behalf of the submitting carrier(s))

Telephone Number: (NPA)-NXX-XXXX

e-mail:

Depending on the issue, same as representatives noted above, with counsel from client groups.

IV. Issue Identification

Name: *(short identifier)* July 2003 Adjustments (AT&T Issue 6)

Brief Description:

In the last several weeks, SBC has identified a number of additional adjustments to AT&T's bills as a result of further billing inaccuracies. SBC has not provided root cause information or disclosed its methodology for determining the credits/debits resulting from these latest errors (which uncovered such errors as loop misclassification errors), leaving AT&T with no ability to determine whether SBC's corrections were accurate.

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered?
2. How many occurrences and approximately over how long a period of time?
3. Is it a recurring problem?
4. Your belief as to the cause of the problem.
5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low?
7. Any other pertinent information?

AT&T refers to its 271 comments and declarations filed in the FCC Michigan 271 proceedings. AT&T will provide copies of these documents if requested.

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so; when and how?
2. Was this issue escalated for dispute resolution? If so, when and in what forum?
3. Last known position of the opposing carrier.
4. Were any bill adjustments made to resolve this issue?
5. Were any policies or procedures changed to address this issue? If so, what changes were made?

AT&T refers to its 271 comments and declarations filed in the FCC Michigan 271 proceedings. AT&T will provide copies of these documents if requested.

VII. Relief Sought

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

AT&T refers to its 271 comments and declarations filed in the FCC Michigan 271 proceedings. AT&T will provide copies of these documents if requested. AT&T believes that SBC's adjustments should be accurate and verifiable. AT&T believes that any process or system issues

causing this problem, and the consistent inability of SBC to provide accurate bills, must be fixed.

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

AT&T correctly points out that it's raised its concerns about this issue in its comments and declarations filed in the FCC Michigan 271 proceedings. Likewise, SBC did respond to AT&T comments in its reply comments. SBC believes the adjustments and statements were clearly explained in SBC's Michigan 271 Application. If AT&T desires further comment from SBC, SBC would ask that AT&T provide additional information above and beyond what is stated in these documents. Copies of SBC's submissions in the Michigan 271 proceeding will be provided upon request.

A. Analysis of Issue

1. Your belief as to the cause of the problem. *See above.*
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *See above.*
3. What performance measures can be implemented to monitor the desired system operation? *See above.*
4. Any other pertinent information? *See above.*

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *See above.*
2. Were any bill adjustments made to resolve this issue? *See above.*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *See above.*
4. Identify any other carrier(s) known to have experienced similar problems. *See above.*
5. Did you identify any other problems arising from or related to this issue? *See above.*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *See above.*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *See above.*

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

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X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

I. Purpose

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II. Directions

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4. *Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.*

III. Submitting Carrier(s) General Information

Submitted by: *(Name of Carrier(s) AT&T*

Contact *[Name of Carrier Representative(s)]*

Telephone Number: *(NPA)-NXX-XXXX*

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David J. Chorzempa

(312) 230-3503

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Subject Matter Expert (SME): *(name)*

Telephone Number: *(NPA)-NXX-XXXX*

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Shannie Tavares

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smtavares@att.com

Authorized Representative: *(Name of person empower to make decisions and enter into agreements on behalf of the submitting carrier(s))*

Telephone Number: *(NPA)-NXX-XXXX*

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